  
CLERK OF THE COURT

**COLEMAN FAMILY REVOCABLE LIVING TRUST,**

By and Through Its Trustees

**SAHAR LEWIS and PLUYD COLEMAN,**

Plaintiffs,

v.

**PNC BANK, N.A., MATRIX TRUST COMPANY, CLEAR RECON CORP., STEFANIE ARMIJO,  
and DOES 1-50,**

Defendants.

**DISTRICT COURT – CLARK COUNTY, NEVADA**

Case No.: A-25-917476-C

Dept. No.: 7

**NOTICE OF SPECIAL APPEARANCE BY TRUSTEES SAHAR LEWIS AND  
PLUYD COLEMAN**

COMES NOW the Plaintiffs, **Sahar Lewis and Pluyd Coleman**, Trustees of the **Coleman Family Revocable Living Trust**, appearing **pecially and not generally**, without waiving any rights, remedies, or immunities under the Constitution, trust law, contract law, or equity, and hereby submit this **Notice of Special Appearance** for the limited purpose of:

1. Challenging jurisdiction;
2. Protecting the Trust's private and equitable interests;
3. Asserting legal and equitable defenses, including but not limited to:
  - Lack of standing;
  - Ultra vires actions by Defendants;
  - Violations of Nevada and federal law;
  - Breach of trust and contract.
  - Security fraud

This appearance shall not be construed as a general appearance, nor shall it constitute consent to personal or subject matter jurisdiction. Plaintiffs expressly **reserve all rights**, including the right to compel discovery, object to venue or process, and preserve equitable remedies.

**SUPPORTING DOCUMENTS:**

Filed concurrently with this Notice are the following:

- **Verified Complaint for Injunctive and Declaratory Relief, Quiet Title, and Damages;**


- **Exhibit A: Memorandum of Ultra Vires Actions by Defendants;**
- **Ex Parte Motion for Temporary Restraining Order and Preliminary Injunction;**
- **Notice of Lis Pendens;**
- **Civil Cover Sheet.**

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Respectfully Submitted,  
This 3<sup>rd</sup> day of April, 2025.


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By:

 , all rights reserved UCC1-388

**Sahar Lewis, Trustee,**  
Coleman Family Revocable Living Trust  
**Special Appearance Only – In Proper Person**

By:

 vac 1-308 without prejudice

**Pluyd Coleman, Trustee,**  
Coleman Family Revocable Living Trust  
**Special Appearance Only – In Proper Person**

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Description of Attached Document

Title of Type of Document NOTICE OF SPECIAL APPEARANCE

Document Date 04/2/2025 Number of Pages 1

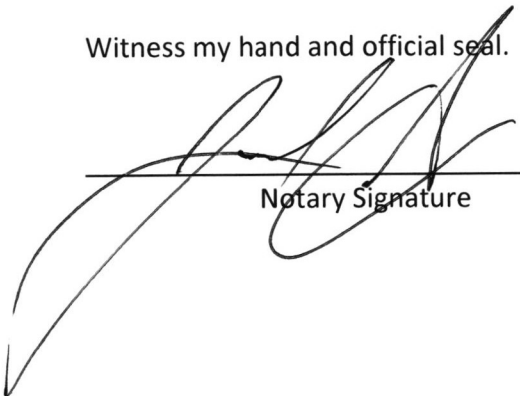
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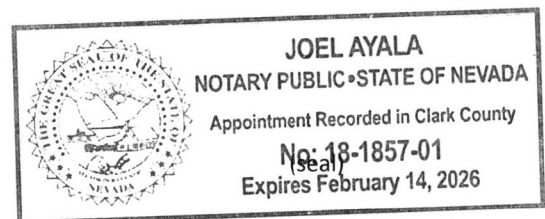
State of NEVADA

§  
County of CLARK

Subscribed and sworn to before me on this 25 of APRIL, in the  
year 2025 by SAHAR AMANDA LEWIS.  
year date month  
name of document signer

Witness my hand and official seal.

  
Notary Signature



Description of Attached Document

Title of Type of Document NOTICE OF SPECIAL APPEARANCE

Document Date 04/2/2025 Number of Pages 1

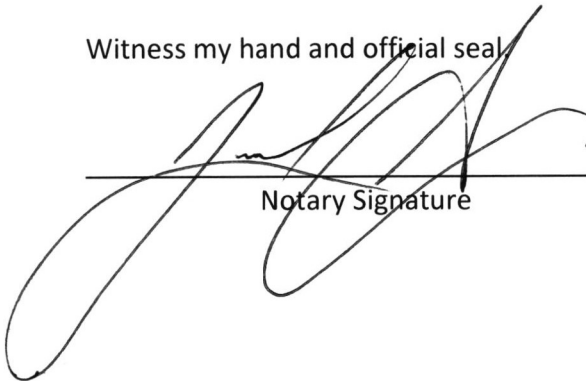
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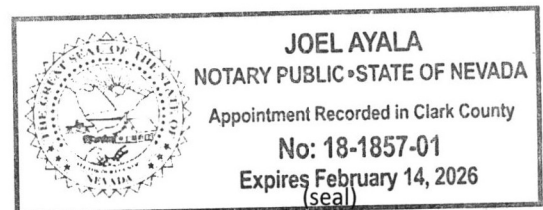
State of NEVADA

§  
County of CLARK

Subscribed and sworn to before me on this 25 of APRIL, in the  
year 2025 by PLUYD COLEMAN JR.  
year date month  
name of document signer

Witness my hand and official seal

  
Notary Signature



**EXHIBIT [A]**

**ULTRA VIRES CLAIM – STANDALONE MEMORANDUM IN SUPPORT OF VERIFIED COMPLAINT**

**COLEMAN FAMILY REVOCABLE LIVING TRUST**

By and Through Its Trustees

**Special Appearance Only – Not a General Appearance**

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**MEMORANDUM: ULTRA VIRES ACTIONS BY DEFENDANTS**

Plaintiff(s), by Special Appearance and without granting jurisdiction, present the following facts and legal reasoning in support of their Verified Complaint for Injunctive Relief, Quiet Title, and Damages.

This memorandum is submitted as **Exhibit [A]** to be incorporated by reference into all causes of action asserted against the named Defendants.

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**I. INTRODUCTION**

The doctrine of **ultra vires**—literally “beyond the powers”—renders any act by a corporate entity, trustee, agent, or officer that exceeds its lawful authority **void ab initio** and without legal effect. Defendants in this action have knowingly and unlawfully engaged in foreclosure actions, securitization activities, and property claims **without legal standing, without a valid contract, and in direct violation of the rights and notices of the Coleman Family Revocable Living Trust (CFRLT)**.

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**II. FACTUAL BASIS**

1. CFRLT is the lawful titleholder and beneficial owner of the subject property.
2. Defendants failed to establish standing or a perfected security interest.
3. No valid assignment or substitution of trustee has been lawfully produced or recorded.
4. The purported “trustee” (Clear Recon Corp.) acted without lawful authority to issue a Notice of Default or Trustee’s Sale.
5. Valid offers to discharge and satisfy the alleged debt were made by the CFRLT and dishonored in violation of UCC 3-603 and 3-311.
6. No compliance with RESPA, TILA, or the contractual conditions precedent was demonstrated.

7. Defendants proceeded despite having actual and constructive notice of the Trust ownership, triggering fiduciary and administrative duties.

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### III. LEGAL ARGUMENT

Under **Nevada law**, and pursuant to the **common law doctrine of ultra vires**, an act that exceeds the authority of a corporation or fiduciary is void and subject to challenge. See:

- *City of Grass Valley v. U.S.*, 69 F.2d 416 (9th Cir. 1934)
- *In re Foreclosure of 2435 Q St., LLC*, 816 S.E.2d 415 (N.C. App. 2018)
- *McNulta v. Lochridge*, 141 U.S. 327 (1891)

Moreover, foreclosure actions that are not compliant with statutory and contractual obligations constitute a **nullity**. The Nevada Supreme Court has held that:

“When a foreclosure is conducted without legal authority, the sale may be void.”  
*See Edelstein v. Bank of N.Y. Mellon*, 286 P.3d 249 (Nev. 2012)

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### IV. RELIEF REQUESTED

Plaintiff demands that:

1. All foreclosure documents and actions taken by unauthorized agents be declared **ultra vires, null, and void**;
2. A judicial declaration confirming **Defendants lacked authority or standing**;
3. The public record be corrected via **quiet title relief and lis pendens**;
4. Defendants be enjoined from taking further ultra vires actions against Trust property;
5. Damages be assessed for the continued harm caused by unauthorized conduct.

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**Submitted with Full Reservation of Rights**

**Coleman Family Revocable Living Trust**

By: Sahar Lewis, Pluyd Coleman, Trustees

**Special Appearance Only**

Date: 4/25/2025

**SAHAR LEWIS, PLUYD COLEMAN Trustee, Coleman Family Revocable Living Trust,**  
**Plaintiff,**

**v.**

**PNC Bank, N.A.; Clear Recon Corp.; Matrix Trust; Stefanie Armijo, et al.,**  
**Defendants.**

**DISTRICT COURT OF CLARK COUNTY, NEVADA**

**Case No.: A-25-916476-C**

**Dept. No.: 7**

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**PROOF OF SERVICE BY MAIL**

I, the undersigned, declare as follows:

I am over the age of 18 and not a party to this action. On the date indicated below, I served the following documents:

- District Court Civil cover sheet
- Verified complaint
- TRO Motion
- Lis Pendes
- Motion to invoke Equity
- Certificate of Dishonour
- Affidavit of Final Default
- Settlement Demand
- This Proof of Service

By placing a true and correct copy of each document in a sealed envelope and mailing them via **United States Postal Service Certified Mail** with postage fully prepaid, addressed as follows:

The PNC Financial Services Group, Inc.

Legal Department

PNC Tower (18th Floor)

300 Fifth Avenue

Mailstop: PT-PTWR-18-1

Pittsburgh, PA 15222 **PNC Bank, N.A.**

Certified Mail No.: 9589 0710 5270 1720 9672 81

**Clear Recon Corp.**

4375 Jutland Dr., Suite 200  
San Diego, CA 92117  
Certified Mail No.: 9589 0710 5270 1720 9672 67

**Matrix Trust Company**

717 17th Street, Suite 1300  
Denver, CO 80202  
Certified Mail No.: 9589 0710 5270 1720 9672 98

**Stefanie Armijo, Trustee**

c/o Matrix trust Co  
717 17th Street, suite 1300 Denver, CO [80202]

Certified Mail No.: 9589 0710 5270 1720 9672 74

**Clerk of the Court**

District Court, Clark County  
200 Lewis Ave  
Las Vegas, NV 89155  
(For filing only — not a party)

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed this 21 day of April, 2025  
at Las Vegas, Nevada.

Signature: 

Name:

SANDRA m BARON

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:  
PNC Financial Group Inc  
Legal Dept PNC Tower (18th Floor)  
300 Fifth Ave Mailstop 7700  
Pittsburgh Pennsylvania 15222



9590 9402 9365 5002 0097 97

Article Number (Transfer from service label)

9589 0710 5270 1720 9672 12

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☒ Agent ☐ Addressee
- B. Received by (Printed Name) Denise C. Date of Delivery 4-15
- D. Is delivery address different from item 1? ☐ Yes ☐ No  
If YES, enter delivery address below:

WZK-1

3. Service Type
- ☐ Priority Mail Express®
  - ☐ Adult Signature
  - ☐ Registered Mail™
  - ☐ Certified Mail®
  - ☐ Signature Confirmation™
  - ☐ Collect on Delivery
  - ☐ Restricted Delivery

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:  
Clear Recon Corp  
Legal Dept  
3333 Camino Del Rio South  
Suite 225  
San Diego California 92108



9590 9402 9365 5002 0097 73

Article Number (Transfer from service label)

9589 0710 5270 1720 9672 36

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☒ Agent ☐ Addressee
- B. Received by (Printed Name) C. Date of Delivery
- D. Is delivery address different from item 1? ☐ Yes ☐ No  
If YES, enter delivery address below:

3. Service Type
- ☐ Priority Mail Express®
  - ☐ Adult Signature
  - ☐ Registered Mail™
  - ☐ Certified Mail®
  - ☐ Signature Confirmation™
  - ☐ Collect on Delivery
  - ☐ Restricted Delivery

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:  
Attn: Stefanie Armijo VP  
Matrix Trust Company  
717 17th St Suite 1300  
Denver Colorado [80202]



9590 9402 9365 5002 0097 80

Article Number (Transfer from service label)

9589 0710 5270 1720 9672 29

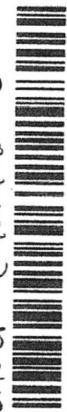
PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:  
Matrix Trust Company  
Legal Dept  
717 17th St Suite 1300  
Denver Colorado [80202]



9590 9402 9365 5002 0097 66

Article Number (Transfer from service label)

9589 0710 5270 1720 9672 43

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☒ Agent ☐ Addressee
- B. Received by (Printed Name) Tyrene Lewis C. Date of Delivery 4-14-25
- D. Is delivery address different from item 1? ☐ Yes ☐ No  
If YES, enter delivery address below:

3. Service Type
- ☐ Priority Mail Express®
  - ☐ Adult Signature
  - ☐ Registered Mail™
  - ☐ Certified Mail®
  - ☐ Signature Confirmation™
  - ☐ Collect on Delivery
  - ☐ Restricted Delivery

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☒ Agent ☐ Addressee
- B. Received by (Printed Name) Tyrene Lewis C. Date of Delivery 4-14-25
- D. Is delivery address different from item 1? ☐ Yes ☐ No  
If YES, enter delivery address below:

3. Service Type
- ☐ Priority Mail Express®
  - ☐ Adult Signature
  - ☐ Registered Mail™
  - ☐ Certified Mail®
  - ☐ Signature Confirmation™
  - ☐ Collect on Delivery
  - ☐ Restricted Delivery